

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

**WESTERN DISTRICT OF OKLAHOMA
M-24-354-SM**United States of America
v.

SEAN PATRICK PALMER

Case No.

24-mj-1222-DLC

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 4/8/2024 in the county of Essex in the
District of Massachusetts, the defendant(s) violated:*Code Section*

18 U.S.C. § 844(i)

Offense Description

Maliciously damaging or destroying a building by means of fire or explosive

This criminal complaint is based on these facts:

See attached affidavit of FBI Special Agent Osama Khudari.

☒ Continued on the attached sheet.DLCOsama Khudari*Complainant's signature*

Osama Khudari, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/15/2024City and state: Boston, MA

Chief U.S. Magistrate Judge Donald L. Cabell

Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Osama Khudari, being first duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since 2021. I am currently assigned to the Boston Field Office, Lowell Resident Agency. I am responsible for conducting national security and other criminal investigations, including those involving suspected acts of terrorism, domestic terrorism, and other national security related crimes. I have extensive training and experience related to national security investigations, as well as matters involving domestic and international terrorism. I have participated in the execution of numerous federal search and arrest warrants in a variety of criminal investigations. Prior to joining the FBI, I was a police officer in Lowell, Massachusetts for 5 years.

2. I submit this affidavit in support of an application for a criminal complaint and arrest warrant charging Sean Patrick Palmer (“PALMER”) with damaging and attempting to damage or destroy by means of fire or an explosive The Satanic Temple (“TST”) in Salem, Massachusetts, a building that is used in interstate or foreign commerce or in any activity affecting interstate or foreign commerce, in violation of Title 18, United States Code, Section 844(i).

3. The facts described in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement personnel and witnesses. This affidavit is intended only to show that there is sufficient probable cause for the requested arrest warrant and does not set forth all my knowledge about this matter. Unless they appear in quotations, the statements of others described in this affidavit are set forth in sum and substance only.

PROBABLE CAUSE

4. The Satanic Temple or “TST” is, according to its website, a “non-theistic organization with active congregations worldwide.” Founded in 2013, TST is headquartered at 64 Bridge Street in Salem, Massachusetts (hereinafter, “64 Bridge Street”). In addition to serving as TST’s headquarters and hosting TST-related events, 64 Bridge Street functions as a public art gallery. Admission to the art gallery requires a ticket, which can be purchased on TST’s website for \$13. TST also operates an online gift shop, which offers a variety of TST-themed items for sale including mugs, apparel, jewelry, statutes, and membership cards, among other items. Given these various uses, there is probable cause to believe that 64 Bridge Street (TST’s headquarters) is used in interstate commerce or in any activity affecting interstate.

5. At approximately 4:14 a.m. on April 8, 2024, surveillance cameras outside TST’s 64 Bridge Street location depicted a person, who appears from the video to be male, igniting and throwing a pipe bomb — a type of improvised explosive device or “IED”—over a fence and onto TST’s property. A photograph of the 64 Bridge Street property is shown below. The IED landed on the covered porch shown in the photo, immediately adjacent to the building’s primary entrance.



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6. After landing on the porch, the IED partially detonated causing minor fire and related damage to TST's exterior. Below is a photograph of the IED. The IED appears to have been constructed from a section of plastic pipe covered with metal nails, which were attached to the pipe with tape. The inside of the pipe was filled with a powder-like substance, preliminarily identified as smokeless gunpowder.



7. The FBI collected the IED on April 8, 2024, and thereafter sent it to the FBI laboratory in Quantico, Virginia, so it could be tested for DNA and fingerprints. Although analysis of the IED is ongoing, analysts located a single human hair on the IED containing a single DNA profile from a Caucasian male. Attempts to match that DNA profile to known profiles in various law enforcement databases have been unsuccessful. Analysts also located one dark-colored dog hair on the device.

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8. The suspect depicted in the TST security footage appears to be somewhat heavy set. He is wearing black pants, a black jacket over a tan-colored tactical vest, black shoes, a black hat, a black face covering, one black glove, and one white glove. The footage shows the suspect approaching TST from the east on foot at approximately 4:14 a.m. He is holding the IED in one hand and what appears to be a lighter in the other hand. The video shows the suspect throwing a small item into a flower bed adjacent to TST, using the lighter to ignite the IED, and then throwing the ignited IED over a fence and onto TST's porch. The suspect then flees west on foot across Bridge Street, onto Lanthrop Street, and out of view. The following is a still image from the surveillance video showing the suspect just before throwing the IED:



9. As part of the investigation, the FBI and other law enforcement agencies searched the 64 Bridge Street property on April 8, 2024. During the search, a six-page handwritten note

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was found in the flower bed depicted in the above photo – the same flower bed into which the suspect appeared to discard a small object just prior to throwing the IED. Among other things, the letter stated:

DEAR SATANIST

ELOHIM SEND ME 7 MONTHS AGO TO GIVE YOU PEACEFUL MESSAGE TO HOPE YOU REPENT. YOU SAY NO, ELOHIM NOW SEND ME TO SMITE SATAN AND I HAPPY TO OBEY. AND ELOHIM WANT ME TO CONTACT YOU TO TELL YOU REPENT. TURN FROM SIN. ELOHIM NO LIKE THIS PLACE AND PLAN TO DESTROY IT. MAYBE SALEM TOO? ELOHIM SEND ME TO FIGHT CRYBABY SATAN, BUT WANT ME TO MAKE HARD EFFORT SO NO ONE DIES. I OBEY.

10. Approximately 7 months earlier, on or about September 11, 2023, TST’s 64 Bridge Street property was vandalized with white spray paint. According to a police report of the incident, the painted text referenced the following Biblical verses: “JOHN 3:16-20, PSALM 141, ACTS 3:19.”¹ The timing of this incident is consistent with the portion of the handwritten letter that reads, “ELOHIM SEND ME 7 MONTHS AGO TO GIVE YOU PEACEFUL MESSAGE TO HOPE YOU REPENT.” Likewise, the religious nature of the painted text is consistent with overall theme of the handwritten letter, which makes numerous references “Elohim” (a Hebrew word for God). To my knowledge, the September 2023 vandalism was not publicized either on television or newspapers. There is probable cause to believe, therefore, that the person responsible for April

¹ ACTS 3:19 reads, “Repent, then, and turn to God, so that your sins may be wiped out, that times of refreshing may come from the Lord....” Similarly, JOHN 3:18 reads, “Whoever believes in him is not condemned, but whoever does not believe stands condemned already because they have not believed in the name of God’s one and only Son.”

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8th IED incident is the same person responsible for vandalizing TST with spray paint in September 2023.

11. During the investigation, the FBI obtained various surveillance and other video footage from homes and businesses near 64 Bridge Street, including video depicting portions of East Collins Street, Planters Street, and Lathrop Street. Portions of this surveillance video depict a black Volvo sedan that drives at a high rate of speed, disobeys traffic laws and street signs, and, in the minutes before and after the IED incident, is in the immediate vicinity of TST.

12. For example, at approximately 4:10 a.m., the Volvo drives the wrong way down Planters Street (a one-way street) toward East Collins Street. The vehicle then drives south on East Collins Street towards Lanthrop Street, approximately one block from TST. (The suspect on the TST surveillance video is seen jogging towards TST from the area of East Collins and Lanthrop Streets.) Within a minute or two after the IED incident, the Volvo is seen driving south on East Collins Street at a high rate of speed before making an erratic U-turn and heading north towards Planters Street and the Essex Bridge (a bridge that connects downtown Salem with the city of Beverly to the north). As the vehicle approached the Essex Bridge, it turned and began traveling south in the northbound travel lane. The car then reversed, entered the correct travel lane, and continued driving south. It appears from these videos, therefore, that the driver of the car was likely not familiar with the Salem area.

13. There is probable cause to believe that the black Volvo sedan was driven by — or, at a minimum, was occupied by — the IED suspect. To begin with, the suspect is seen running towards East Collins and Lathrop Streets at approximately 4:14 a.m. Just two minutes later, the black Volvo is seen driving at a high rate of speed in the same area of East Collins Street. I know from my training and experience that individuals who travel by vehicle to a particular location in

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order to commit a crime, with the intent to flee the scene in that same vehicle, will often park their vehicle within a walkable distance of the intended crime scene and approach the crime scene on foot so as to reduce the risk of being detected. Furthermore, I know that individuals who flee the scene of a crime in a car will often drive more hastily than other drivers — just as the driver of the black Volvo did — in order to distance themselves from the crime scene as quickly as possible, often times committing traffic violations in the process.

14. Based on the surveillance footage that I have reviewed, the black Volvo (hereinafter, the “Target Volvo”) displays a rear license plate but no front license plate. Neither the state of registration nor the license plate number are discernable in the videos. However, records maintained by the Massachusetts State Police (“MSP”) indicate that a black, 2007 Volvo S40 sedan with an Oklahoma registration was detected by MSP license plate readers in Randolph and Lynn, Massachusetts, at approximately 1:52 a.m. and 2:21 a.m., respectively, on April 8th. This vehicle fits the general description of the Target Volvo.

15. The Target Volvo is seen in surveillance videos entering downtown Salem for the at approximately 2:41 a.m. on April 8, 2024 – approximately 90 minutes before the IEC incident. According to Google Maps, it takes approximately 50 minutes to drive between Randolph and Salem depending on traffic and other factors. Thus, it is plausible that the Target Volvo could have left Randolph at 1:52 a.m. and arrived in Salem at 2:41 a.m. Furthermore, I am aware that Oklahoma is one of several states that does not require cars to display a front license plate (the Target Volvo had no front plate in the Salem surveillance videos). There is probable cause to believe, therefore, that the black Volvo sedan detected in Randolph and Revere during the early morning hours of April 8th is the Target Volvo.

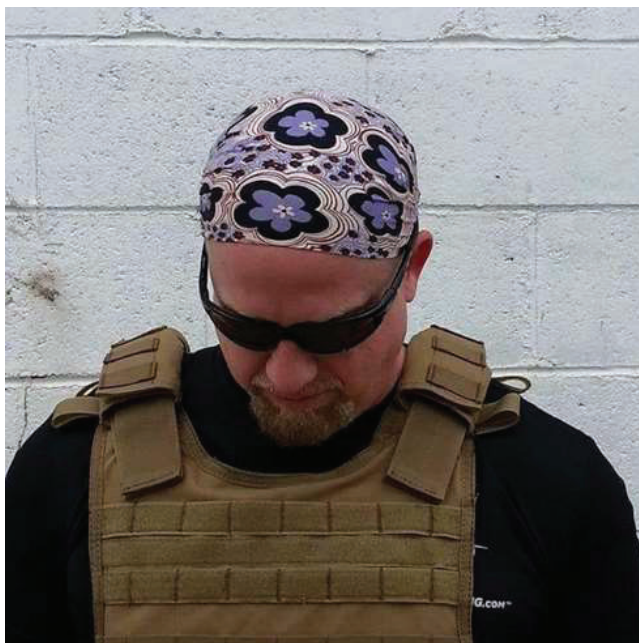
16. According to records that I have reviewed, the Target Volvo is registered to an

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individual named Steven Patrick Palmer (“PALMER”) at 11308 South Perkins Road in Perkins, Oklahoma.

17. Open-source research also indicates that PALMER maintains two Facebook accounts. Although Meta (which owns and operates Facebook) has yet to respond to legal process seeking subscriber records associated with these two accounts, photographs posted by the user of both accounts match the photograph of PALMER maintained by the Oklahoma Registry of Motor Vehicles. Based on these photographs, PALMER appears to be a Caucasian male. As noted above, FBI analysts identified DNA from a Caucasian male and one dark-colored dog hair on the IED. Photographs of PALMER on Facebook indicate that he owns at least one dog with dark hair.

18. As depicted in Paragraph 8 above, the IED suspect was wearing a tan-colored tactical vest during the incident. A photograph of PALMER on Facebook from February 2018 shows him wearing a similar tan-colored tactical vest.



19. Additionally, PALMER frequently makes public posts about religious matters on

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Facebook, many of which contain similar themes to the handwritten note found outside TST on April 8, 2024. Some of these posts also reference the same Biblical verses as those that were spray painted on TST in September 2023. In a December 1, 2023, group post titled “CRUSHING ALL ATHIESM AND EVOLUTIST ARGUMENTS,” for example, PALMER wrote, “There is still time for you. John 3:16-20; John 14:6; Acts 3:19. Accept Jesus Now. Today, someone will run out of time.” On January 9, 2024, in the same publicly available group chat, PALMER wrote a lengthy post that included the following: “Forgiveness is available to those that repent. Accept Jesus of eternal life. Take the 1 step. No greater Love. John 3:16-20; John 14:6; Acts 3:19.” Shortly thereafter, PALMER wrote to another user in approximately January 2023, “... although if someone is worshipping a loser, like satan [sic], then I expect them to also be a coward” and “[I] [h]ate to burst your bubble, my dude, but satan [sic] exists. I wish he didn’t, but he does.”


20. According to records provided to the FBI by a national home improvement retailer, at one of the retailer’s stores in Stillwater, Oklahoma (approximately 15 minutes north of Perkin’s Oklahoma), PALMER exchanged a roughly two-foot piece of PVC pipe and a corresponding end cap for another length of PVC pipe and one end cap. The IED found at TST in Salem was constructed using a roughly two-foot section of PVC pipe and one end cap.

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CONCLUSION

21. Based on the information described above, I submit there is probable cause to believe SEAN PATRICK PALMER committed a violation of 18 U.S.C. § 844(i). Therefore, your affiant respectfully requests this Court issue an arrest warrant for PALMER.

Sworn to under the pains and penalties of perjury,

DLC

Osama Khudari
Special Agent
Federal Bureau of Investigation

Sworn to before me via telephone on April 15, 2024.


HONORABLE DONALD L. CABELL
CHIEF UNITED STATES MAGISTRATE JUDGE



UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

SEAN PATRICK PALMER

Case No. 24-mj-1222-DLC

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) SEAN PATRICK PALMER,
who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Maliciously damaging or destroying a building by means of fire or explosive.

Date: 04/15/2024City and state: Boston, Massachusetts
Issuing officer's signature

Chief United States Magistrate Judge Donald L. Cabell

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature_____
Printed name and title